

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR RECORD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: LIBERTY ENERGY (MID-STATES) CORP D/B/A LIBERTY UTILITIES - CENTRAL	Operator ID#: 38906
Inspection Date(s): 11/18/2014 (Half), 11/19/2014, 11/20/2014, 11/21/2014	Man Days: 3.5
Inspection Unit: Harrisburg	
Location of Audit: Harrisburg	
Exit Meeting Contact: David Hinds	
Inspection Type: Standard Inspection - Record Audit	
Pipeline Safety Representative(s): Jim Watts	
Company Representative to Receive Report: David Hinds, Michael Beatty, Ron Snider	
Company Representative's Email Address: david.hinds@libertyutilities.com, mike.beatty@libertyutilities.com, Ronald.Snider@libertyutilities.com	

Headquarters Address Information:	2370 North High Street Suite 1 Jackson, MO 63755 Emergency Phone#: (855) 644-8134 Fax#:	
Official or Mayor's Name:	David Swain Phone#: (573) 755-0107 Email: david.swain@libertyutilities.com	
Inspection Contact(s)	Title	Phone No.
David Hinds	Manager Compliance and Measurement	(573) 221-4964
Deon Scott	Manager Operations - Harrisburg - Metropolis	(618) 253-7041
Ron Snyder	Manager Compliance and Measurement	(573) 471-9919

Gas System Operations	Status
Gas Transporter	Texas Eastern
Annual Report (Form 7100.1-1) reviewed for the year:	Satisfactory
Unaccounted for Gas	1.6-1.8%
Number of Services	25,838
<u>General Comment:</u> <i>This is the total service count for Illinois for 2013.</i>	
Miles of Main	695

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<u>General Comment:</u>		
<i>These are companywide numbers for Illinois service area.</i>		
Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)		Satisfactory
<u>General Comment:</u>		
<i>The MAOP records are maintained in Jackson, Missouri at Liberty Mid States Headquarters. MAOP's have been determined by pressure test using prior data that is maintained by engineering.</i>		
Operating Pressure (Feeder)		397,
Operating Pressure (Town)		20,23.5,30,40,45,50,60,70
Operating Pressure (Other)		Not Applicable
<u>General Comment:</u>		
<i>There are no other operating pressure classifications utilized in the Liberty Systems.</i>		
MAOP (Feeder)		397,150,80
MAOP (Town)		26,50,60
MAOP (Other)		Not Applicable
<u>General Comment:</u>		
<i>There are no other types of MAOP's.</i>		
Does the operator have any transmission pipelines?		No
<u>General Comment:</u>		
<i>There is no Transmission in the Harrisburg Service area.</i>		
Regulatory Reporting Records		Status
[191.5]	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Not Applicable
<u>General Comment:</u>		
<i>There were no reportable incidents in 2012-2013.</i>		
[191.9(a)]	Was a DOT Incident Report Form F7100.1 submitted within 30 days after detection of an incident?	Not Applicable
<u>General Comment:</u>		
<i>There were no reportable incidents in 2012-2013.</i>		
[191.9(b)]	Were any supplemental incident reports submitted when deemed necessary?	Not Applicable
<u>General Comment:</u>		

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<i>No supplemental reports were required to be submitted in 2012-2013.</i>		
Did the operator have any plastic pipe failures in the past calendar year?	Not Applicable	
<u>General Comment:</u> <i>There were no plastic piping failures that required reporting in 2012-2013.</i>		
Did the operator take action to mitigate safety concerns relating to the failure of the PE or pipeline components?	Not Applicable	
<u>General Comment:</u> <i>There have been no plastic piping failures that require mitigation of any safety concerns.</i>		
[191.23(a)]	Did the operator report Safety Related Conditions?	Not Applicable
<u>General Comment:</u> <i>There were no safety related conditions that occurred in 2012-2013.</i>		
[191.25]	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?	Not Applicable
<u>General Comment:</u> <i>There were no safety related conditions that occurred in 2012-2013.</i>		
[192.16(c)]	Customer Notification: Has the operator notified each new customer within 90 days about the customer's responsibility regarding buried piping, however, operators of a master meter may continuously post a general notice in a permanent location?	Satisfactory
DRUG TESTING		Status
Refer to Drug and Alcohol Inspection Forms and Protocols		Not Checked
<u>General Comment:</u> <i>The drug and alcohol records were not reviewed during this audit. This was reviewed during the DA Plan audit conducted in April of 2014 at the Jackson, Missouri Headquarters.</i>		
TEST REQUIREMENTS		Status
[192.517(a)][192.505,192.507,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed pressure tests for piping operating above 100 psig for 2012-2013 and were tested at 650 psig.</i>		
[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	Satisfactory
<u>General Comment:</u>		

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<i>Staff reviewed pressure test documentation for piping operating below 100 psig installed in 2012-2013 and were tested at 120 psig.</i>		
[192.603(b)][192.725]	Were service lines temporarily disconnected from the main properly tested prior to reconnection?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed pressure tests for reinstated services for 2012-2013.</i>		
UPRATING		Status
<u>Category Comment:</u> <i>No uprating was conducted in 2012-2013 in the Harrisburg service area.</i>		
[192.555][192.555]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	Not Applicable
[192.557][192.557]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	Not Applicable
OPERATIONS		Status
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed documentation indicating the O&M was reviewed as required in 2012-2013.</i>		
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		Yes
<u>General Comment:</u> <i>The OQ plan was reviewed annually as part of the O&M in 2012-2013. The review documentation is maintained with the O&M.</i>		
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	Satisfactory
<u>General Comment:</u> <i>The maps are available electronically to field personnel, operating history and construction records are available electronically or through paper documentation available at the Harrisburg Office.</i>		
[192.603(b)][192.605(b)(8)]	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	Not Applicable
<u>General Comment:</u> <i>Inspections are recorded on electronic forms located in the Wennsoft Program that are task specific and require the employee to record what tasks were completed. The supervisor then reviews the tasks performed to determine they were completed correctly. If tasks were not recorded being completed correctly, the issue is discussed with the employee and the tasks is corrected or if necessary the task is performed again. Compliance personnel also conduct reviews of completed tasks. There have been no instances where procedures were revised due to inspections performed in 2012-2013. Issues with the computer program</i>		

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are sent to the Corporate Office for corrective actions.

CONTINUING SURVEILLANCE RECORDS		Status
[192.603(b)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual operating and maintenance conditions?	Satisfactory
<p>General Comment:</p> <p>Staff reviewed patrols, failures, leak history, changes in cathodic protection and other unusual operating and maintenance conditions.</p> <p>There were no changes to class location in 2012, 2013. Leaks were repaired as required and corrosion issues were corrected when deficiencies were observed. Liberty has initiated a replacement program for bare steel and PVC piping remaining in the Illinois system.</p> <p>Due to the overpressure of the Muddy System on the 4th of February, 2014, 1805P reliefs were exchanged with 1808 reliefs due to issues detected to a needle valve sticking on the pilot regulator.</p>		
[192.491][192.489]	Does the operator have records verifying if exposed cast iron was examined for evidence of graphitization and if necessary what appropriate action was taken concerning graphitization?	Not Applicable
<p>General Comment:</p> <p>There is no Cast Iron in the Illinois Service Area.</p>		
[192.603(b)][192.755]	Does the operator have surveillance records of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating and maintenance conditions?	Not Applicable
<p>General Comment:</p> <p>There is no Cast Iron in the Illinois Service Area.</p>		
[192.603(b)][192.753(a)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of more than 25 (psig.) sealed as required?	Not Applicable
<p>General Comment:</p> <p>There is no Cast Iron in the Illinois Service Area.</p>		
[192.603(b)][192.753(b)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of 25 (psig.) or less and is exposed for any reason sealed as required?	Not Applicable
<p>General Comment:</p> <p>There is no Cast Iron in the Illinois Service Area.</p>		
QUALIFICATION OF PIPELINE PERSONNEL		Status
Refer to operator Qualification Inspection Forms and Protocols		Not Checked

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<u>General Comment:</u> <i>The Operator Qualification plan was not reviewed as part of this inspection. Staff did review the OQ qualifications of the Harrisburg Personnel to ensure that they were current on their qualifications in 2012-2013.</i>		
DAMAGE PREVENTION RECORDS		Status
[192.603(b)][191.11(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	Satisfactory
<u>General Comment:</u> <i>2012 - 8806 locates with 34 damages and 2013 - 7933 locates with 35 damages.</i>		
Has the number of damages increased or decreased from prior year?		Increased
<u>General Comment:</u> <i>Due to the increase in the number of damages per 1000 locates, in 2014 Liberty improved the review process for third party damages used to establish the cause for the damage. They reiterated to employees that all services shall be abandoned as close as practical to the main. Stubs cannot be left unless approved by Engineering. Third party damages are now being sent to the finance department to ensure the excavator is being billed for any damages. Liberty is also submitting damage reports to JULIE Enforcement to the ICC for review. Excavator meetings have been held with repeat offenders who are not following one call laws.</i> <i>Staff reviewed the findings of the reviews conducted and determined that a majority of the damages were due to excavators not following the current damage prevention laws. If an employee is found not following established procedures the employee is disqualified and receives training and is requalified of which has not been the case in Harrisburg service area or in Illinois.</i>		
[192.603(b)][192.617]	Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence?	Satisfactory
<u>General Comment:</u> <i>In 2014 Liberty established a review process for third party damages to establish the cause for the damage. They reiterated to employees that all services shall be abandoned as close as practical to the main. Stubs cannot be left unless approved by Engineering. Third party damages are now being sent to the finance department to ensure the excavator is being billed for any damages. Liberty is also submitting damage reports to JULIE Enforcement to the ICC for review. Excavator meetings have been held with repeat offenders who are not following one call laws. Staff reviewed the findings of the reviews conducted and determined that a majority of the damages were due to excavators not following the current damage prevention laws. If an employee is found not following established procedures the employee is disqualified and receives training and is requalified of which has not been the case in Harrisburg service area or in Illinois.</i>		
[192.603(b)][192.614(c)(3)]	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	Satisfactory
<u>General Comment:</u> <i>Kortera software is utilized to notify the excavator if no Liberty gas facilities are present. All locates are responded to and marked accordingly. The supervisors receive reports indicating when locates are not conducted within the times as required by the one call laws. Staff reviewed reporting utilized by Liberty to determine how many locates were responded to within the required interval reviewed completed random locates to review comments that were recorded by the employee performing the locate. Staff reviewed the listing of locates performed late and found that they were joint meets or the locates on large jobs that had been started but completed after the dig start time.</i>		
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		Yes
<u>General Comment:</u> <i>Liberty does not currently have a QA program in place but monitors the damages to facilities by conducting field reviews of the completed locate request to determine if they were completed and marked correctly.</i>		

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Do pipeline operators include performance measures in facility locating contracts?		Not Applicable
<u>General Comment:</u> <i>Liberty does not utilize contract locators. Locates are performed by company employees.</i>		
[IL ADM. CO.265.100(b)(1)]	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? http://www.icc.illinois.gov/julie/	Satisfactory
Has the Operator adopted applicable sections of the Common Ground Alliance Best Practices?		Yes
<u>General Comment:</u> <i>Liberty has adopted the applicable best practices for damage prevention.</i>		
If no, were Common Ground Alliance Best Practices discussed with Operator?		Not Applicable
<u>General Comment:</u> <i>N/A Liberty has adopted the applicable best practices for damage prevention.</i>		
EMERGENCY PLANS		Status
[192.603(b)][192.615(b)(1)]	Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan?	Satisfactory
<u>General Comment:</u> <i>Supervisors are provided a copy of the latest edition of the emergency plan.</i>		
[192.603(b)][192.615(b)(2)]	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed documentation indicating operating personnel received training on the Emergency Plan in November of 2012 and in February of 2013.</i>		
[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	Satisfactory
<u>General Comment:</u> <i>Supervisors conduct reviews of all of the emergency tickets to determine whether the procedures were effectively followed.</i>		
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	Satisfactory
<u>General Comment:</u>		

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Liberty utilizes Paradigm to maintain liaison with appropriate fire, police and public officials. The local Operations Manager is present at the meetings held in Marion in February of 2012 and 2013.

[192.603(b)][192.615(a)(3)]	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	Satisfactory
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General Comment:

There were no call over one hour in 2012. The 5 calls that exceeded one hour in 2013 were due to remote computer issues or failure to enter the arrival times. There were no calls in 2013 that exceeded one hour due to weather, multiple leak calls or after hour call outs. Average response times in 2013 were 20 minutes. In 2012 Harrisburg had a Tornado and in event of a natural disaster the call centers are notified that an emergency has occurred to allow for staffing changes.

PUBLIC AWARENESS PROGRAM - RECORDS	Status
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Refer to Public Awareness Program Inspection Forms and Protocols	Not Checked
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General Comment:

The Public Awareness plan was not reviewed as part of this audit.

ODORIZATION OF GAS	Status
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[192.603(b)][192.625(f)]	Has the operator maintained documentation of odorant concentration level testing using an instrument?	Satisfactory
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General Comment:

Employees who perform odorant level testing are tested annually for their ability to detect odorant. Odorometer tests were conducted in 2012 and 2013 on a monthly basis. Random review of completed tests indicated odorant levels were maintained with detection levels at 0.25 pounds per mmcf. Sniff checks are performed by company personnel when they conduct orders that allow access to natural gas. During this test only a sniff test is performed and does not quantify the level of detection.

[192.603(b)][192.625(e)]	Has the operator maintained documentation of odorizer tank levels?	Satisfactory
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General Comment:

There is one injection odorizer at the main supply to the Harrisburg system and a bypass odorizer at the Harco and Storage field take points. They conducted monthly tank inspections in 2012-2013.

[192.603(b)][192.625(f)(1)]	Are master meter operators receiving written verification of odorant concentration levels from their gas supplier?	Not Applicable
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General Comment:

This does not apply to this operator as they are not a master meter operator.

[192.603(b)][192.625(f)(2)]	Has the master meter operator maintained documentation of sniff tests performed as required by this section?	Not Applicable
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General Comment:

This does not apply to this operator as they are not a master meter operator.

PATROLLING & LEAKAGE SURVEY	Status
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[192.603(b)][192.721(b)(1)]	Is the operator patrolling business districts at a minimum of 4 per year/4 1/2 months?	Satisfactory
<u>General Comment:</u> <i>Patrols on piping located in business districts were conducted on a quarterly basis in 2012-2013.</i>		
[192.603(b)][192.721(b)(2)]	Is the operator patrolling outside business districts at a minimum of 2 per year/7 1/2 months?	Satisfactory
<u>General Comment:</u> <i>Patrols in the Harrisburg system are and were conducted on a quarterly basis in 2012-2013. Review of the 2012 -2013 patrols indicates they were conducted as required. Staffs review of indicated issues detected during patrols such as missing markers, exposed pipe or coating and paint issues were corrected in a timely manner.</i>		
[192.603(b)][192.723(b)(1)]	Is the operator performing leakage surveys in business districts at a minimum of 1 per year/ 15 months? If the operator has inside meter sets that meet this criterion then were those surveyed?	Satisfactory
<u>General Comment:</u> <i>Review of the Business District leak surveys in the Harrisburg service area indicates they were conducted annually in 2012-2013 as required.</i>		
[192.603(b)][192.723(b)(2)]	Is the operator performing leakage surveys outside a business district at a minimum of every 5 years/63 months? Is the operator performing leakage surveys on cathodically unprotected pipelines at a minimum of every 3 years/39 months? If the operator has inside meter sets that meet this criterion then were those surveyed? If the operator has yard lines then are those being surveyed?	Satisfactory
<u>General Comment:</u> <i>Review of the residential leakage surveys conducted on protected and plastic piping performed in 2012-2013 indicates the surveys were completed on a five year cycle as required. Bare or poorly coated piping surveys in residential areas in 2012-2013 were conducted annually as required by company procedure. Yard Line surveys due in 2012-2013 were conducted as required on a three year interval.</i>		
YARD LINES - RESIDENTIAL		Status
[220 ILCS 2.2.03]	Has the operator designated and documented the location of all services where the meter is located more than 3 feet away from the wall of a residence?	Satisfactory
<u>General Comment:</u> <i>Leak surveys for yard lines due in 2012-2013 were completed as required on a three year cycle.</i>		
[192.463,220 ILCS 2.2.03][220 ILCS 2.2.03]	Has the operator determined if cathodic protection is required on these services?	Satisfactory
<u>General Comment:</u> <i>Yard lines have been determined to be non-protected and are surveyed as unprotected.</i>		

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[192.723(b)(1),192.723(b)(2)][220 ILCS 2.2.03]	After the determination of the cathodic protection requirements, has the operator surveyed each line within the required leakage survey intervals?	Satisfactory
<u>General Comment:</u> <i>All yard lines are surveyed on a three year cycle.</i>		
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas?	Satisfactory
<u>General Comment:</u> <i>Review of retirement orders for 2012-2013 indicates that abandoned pipelines were disconnected from its source and were purged as required.</i>		
[192.603(b)][192.727(c)]	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	Satisfactory
<u>General Comment:</u> <i>Review of retirement orders for 2012-2013 indicates that abandoned pipelines were disconnected from its source and were purged as required.</i>		
[192.603(b)][192.727(d)]	Did the operator maintain documentation demonstrating that whenever service to a customer was discontinued access to gas was either; locked, prevented by a mechanical fitting, or disconnected from the gas supply and open pipe ends sealed?	Satisfactory
<u>General Comment:</u> <i>Review of service orders for service disconnects performed in 2012-2013 indicates the gas supply was secured by locking the valve or disconnecting the customers piping.</i>		
[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	Satisfactory
<u>General Comment:</u> <i>Review of retirement orders for 2012-2013 indicates that abandoned pipelines were disconnected from its source and were purged as required.</i>		
[192.727(g)][192.727(g)]	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	Not Applicable
<u>General Comment:</u> <i>Liberty has no piping that crosses a navigable water way in the Harrisburg Service Area.</i>		

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PRESSURE LIMITING AND REGULATION		Status
[192.603(b)][192.739(a)]	Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months?	Satisfactory
General Comment: Review of the 2012-2013 inspections for pressure regulating and overpressure protection equipment in the Harrisburg system indicated the inspections were conducted within the allowable time frames and were set within allowable pressure ranges for the applicable MAOP's.		
[192.603(b)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	Satisfactory
General Comment: Review of capacity reviews conducted in 2012-2013 indicate adequate relief capacities are being maintained in the Harrisburg system.		
[192.603(b)][192.743(b)]	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	Satisfactory
General Comment: Review of 2012-2013 capacity reviews conducted by engineering indicate they were reviewed as required and were found to have adequate capacities.		
[192.603(b)][192.741(a),192.741(b)]	Is each distribution system supplied by more than one district pressure regulating station, or where required by the operator on a system supplied by a single regulating station, equipped with telemetering or recording pressure gauges to indicate the gas pressure in the district?	Satisfactory
General Comment: Multi fed systems are monitored by pressure recording charts. Staff conducted a random review of pressure recording charts and observed no indications of abnormal pressures in 2012-2013.		
[192.603(b)][192.741(c)]	If there were indications of abnormally high- or low-pressure, were actions taken to correct any unsatisfactory operating conditions?	Satisfactory
General Comment: Review of random weekly charts for 2012-2013 indicate there were no excessive high or low pressures observed.		
[192.603(b)][192.743(a),192.743(b),192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	Yes
General Comment: Currently Liberty is in the process of purchasing property at both take points in the Harrisburg system to allow for these stations to be rebuilt and will include overpressure protection as part of the new design.		
[192.603(b)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	Satisfactory
General Comment:		

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Currently Liberty is in the process of purchasing property at both take points in the Harrisburg system to allow for these stations to be rebuilt and will include overpressure protection as part of the new design.

VALVE MAINTENANCE		Status
[192.603(b)][192.747(a),192.747(b)]	Did the operator inspect and maintain distribution valves necessary for the safe operation of the system at a minimum of 1 per year/15 months?	Satisfactory
General Comment: <i>Review of the valve inspections performed in 2012-2013 were conducted within the allowable intervals. Random review of completed valve inspections indicated the valve inspections reviewed were completed as required by company procedures.</i>		
[192.603(b)][192.749(a)]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	Not Applicable
General Comment: <i>There are no vaults in the Harrisburg system meeting these requirements.</i>		
Investigation Of Failures		Status
[192.603(b)][192.617]	Did the operator experience accidents or failures requiring analysis?	Not Applicable
General Comment: <i>There were no failures or accidents in 2012-2013 that required analysis.</i>		
WELDING OF STEEL PIPE		Status
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	Satisfactory
General Comment: <i>Review of the welding procedures located in the Liberty Welding Manual determined they have qualified welding procedures.</i>		
[192.603(b)][192.227,192.229]	Does the operator have documentation of welder qualification as required?	Satisfactory
General Comment: <i>Review of 2012-2013 welder qualifications indicates they were re-qualified per API-1104 requirements.</i>		
[192.807]	Does the operator have documentation of welder OQ records?	Satisfactory
General Comment: <i>Review of the individuals qualified for welding determined they were current in their qualifications.</i>		
[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	Not Applicable
General Comment: <i>No NDT was conducted in 2012-2013.</i>		

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[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	Not Applicable
<u>General Comment:</u> No NDT was conducted in 2012-2013.		
JOINING OF MATERIAL OTHER THAN WELDING		Status
[192.603(b)][192.285]	Are persons making joints with plastic pipe qualified?	Satisfactory
<u>General Comment:</u> Review of individuals qualified for plastic fusion indicates they were re-qualified as required in 2012-2013.		
[192.603(b)][192.287]	Are persons inspecting plastic pipe joints qualified?	Satisfactory
<u>General Comment:</u> Review of individuals qualified for plastic fusion indicates they were re-qualified as required in 2012-2013.		
[192.603(b)][192.283]	Are qualified joining procedures for plastic pipe in place?	Satisfactory
<u>General Comment:</u> Review of Liberty's fusion procedures located in the Construction Manual which is part of the O&M indicate they are qualified as required. These are PPI procedures that were adopted by Liberty.		
CORROSION CONTROL RECORDS		Status
[192.491(a)][192.491(a)]	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system?	Satisfactory
<u>General Comment:</u> Liberty currently maintains paper maps of cathodically protected piping, anode installations and rectifier locations. Test point readings are maintained in their Wennsoft program. Folders are maintained for each system indicating the work that has been performed on that system.		
[192.491][192.459]	Has the operator maintained documentation of an examination when buried pipe was exposed?	Satisfactory
<u>General Comment:</u> Review of SSD orders completed in 2012-2013 indicate exposed piping inspections were conducted when required.		
[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually?	Satisfactory
<u>General Comment:</u> Review of pipe to soil readings for 2012-2013 indicated they were conducted as required within the allowable time frames. Review of isolated services indicated		

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<i>they were inspected in 2012-2013 as required and were conducted on a five year interval.</i>		
[192.491][192.465(b)]	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	Satisfactory
<u>General Comment:</u> <i>Review of rectifier inspections determined they were inspected 6 times a year in 2012-2013.</i>		
[192.491][192.465(c)]	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	Not Applicable
<u>General Comment:</u> <i>There are no critical or non-critical bonds in the Harrisburg Service area.</i>		
[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	Satisfactory
<u>General Comment:</u> <i>Review of Breaches issued due to deficiencies observed during corrosion monitoring inspections performed in 2012-2013, indicate corrective actions were taken to remediate the deficiency.</i>		
[192.491][192.465(e)]	Has the operator maintained documentation of unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	Satisfactory
<u>General Comment:</u> <i>Review of leak surveys conducted on unprotected piping indicate the surveys were conducted on a three year cycle in 2012-2013. In areas of corrosion identified during the leak surveys, hot spotting was initiated by adding anodes during the leak repair.</i>		
[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation at casings?	Satisfactory
<u>General Comment:</u> <i>Review of casing test points indicate they were inspected as required in 2012-2013.</i>		
[192.491][192.469]	Does the operator have a sufficient number of test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection?	Satisfactory
<u>General Comment:</u> <i>Liberty determines the number of test points according to the size of the system. Test points are then spotted throughout the system with a minimum of one at the start and end of the system.</i>		
[192.491][192.471]	Has the operator maintained documentation of	Satisfactory

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	corrective actions taken when a test lead is no longer electrically conductive?	
General Comment: <i>No issues with test leads were identified in 2012-2013.</i>		
[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures?	Not Applicable
General Comment: <i>No rectifiers were installed in the Harrisburg system 2012-2013. If a rectifier is installed, Liberty conducts testing to determine if they are affecting neighboring structures or utilities.</i>		
[192.491][192.475(a)]	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	Not Applicable
General Comment: <i>Liberty is not transporting corrosive gas in the Harrisburg System.</i>		
[192.491][192.475(b)]	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	Satisfactory
General Comment: <i>Review of 2012-2013 SSD's indicates internal piping inspections were conducted when piping was removed.</i>		
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	Not Applicable
General Comment: <i>There is no internal corrosion coupon monitoring testing performed in the Harrisburg system due to no indications of internal corrosion being identified.</i>		
[192.491][192.481]	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	Satisfactory
General Comment: <i>The atmospheric corrosion survey was conducted by Liberty in 2012 with the previous surveys being conducted in 2009 and 2011.</i>		
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	Satisfactory
General Comment: <i>Review of the atmospheric corrosion survey conducted in the Harrisburg Service Area in 2012 indicated that corrective actions were completed where indications of corrosion were identified.</i>		
[192.491][192.483(a),192.483(b),192.483(c)]	Has the operator maintained documentation demonstrating that pipe removed due to external	Satisfactory

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	corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	
<u>General Comment:</u> <i>Review of corrective actions due to the findings of the atmospheric corrosion survey, indicated piping was removed when wall loss was identified. A majority of these were due to corrosion on meter bar where coating failures had occurred. One riser was repaired using Trident pipe repair method.</i>		
TRAINING - 83 IL ADM. CODE 520		Status
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	Satisfactory
<u>General Comment:</u> <i>Review of current employee qualifications indicate documentation is being maintained to demonstrate that personnel have received the required training.</i>		
[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	Satisfactory
<u>General Comment:</u> <i>The operator maintains documentation of training and meetings held with operating personnel and indicates what training is provided.</i>		
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Not Applicable
<u>General Comment:</u> <i>Liberty is not a municipal operator.</i>		
[520.10(a)(5)]	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Satisfactory
<u>General Comment:</u> <i>There was no new products or methods initiated in 2012-2013 that would have required training or qualification.</i>		

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